

**Declaration of A. Nicole Hallett**

I declare pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct:

1. My name is A. Nicole Hallett and I am the attorney of record in this case.
2. I write this declaration in support of Petitioner's Motion to Seal his declaration filed in support of his Response to Respondent's Motion to Enforce the Protective Order.
3. Petitioner's declaration contains information that the government has previously moved to file under seal, ECF No. 105, and that the Court subsequently granted leave to file under seal. ECF No. 107.
4. In addition, Petitioner's declaration contains sensitive, non-public information regarding allegations against Petitioner by a government informant.
5. Petitioner would be harmed by having these allegations prematurely revealed to the public before he has had an opportunity to rebut them.
6. Moreover, making these allegations public may harm the government's ongoing efforts to effectuate Mr. Hassoun's removal.
7. For these reasons, Petitioner respectfully requests that the Court grant his Motion to Seal his declaration.

Dated: March 18, 2020  
Chicago, IL

/s/ A. Nicole Hallett

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A. Nicole Hallett

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